CHRISTOPHER CHIOU 1 Acting United States Attorney 2 District of Nevada Nevada Bar Number 14853 3 SKYLER H. PEARSON Assistant United States Attorney 501 Las Vegas Blvd. So., Suite 1100 5 Las Vegas, Nevada 89101 (702) 388-6336 skyler.pearson@usdoj.gov 6 7 Attorneys for the United States 8 UNITED STATES DISTRICT COURT 9 **DISTRICT OF NEVADA** 10 Case No. 2:21-cv-00470-APG-VC 11 Ramiro J. Cuadra, 12 Plaintiff, 13 Joint Status Report and Request to v. Continue the Stay of the Proceedings 14 Alejandro Mayorkas, in his official capacity An Additional 60 Days as acting Secretary of Homeland Security; 15 U.S. Department of Homeland Security; Tracy Renaud, in her official capacity as 16 acting Director of U.S. Citizenship and Immigration Services; U.S. Citizenship and 17 Immigration Services; the United States of America; and John Does I through XX, 18 inclusive, 19 Defendants. 20 21 The parties, by and through their respective counsel, hereby file this joint status 22 report and stipulate and jointly move the Court to continue to stay all deadlines an 23 additional 60 days in this matter based on the following: 24 1. On March 23, 2021, Plaintiff filed his Complaint for Relief in the Nature of 25 Mandamus (ECF No. 1), requesting, among other things, that the Court issue a Writ of 26 Mandamus compelling the United States Citizenship and Immigration Services ("USCIS") 27 to adjudicate Plaintiff's I-485 application. 28

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1 9. If the parties are unable to resolve this matter and the case is not dismissed, 2 the parties agree to file another joint status report 60 days after the entry of the Court's 3 order on this stipulation. 4 Respectfully submitted this 10th day of January 2022. 5 CHRISTOPHER CHIOU 6 **REZA ATHARI & ASSOCIATES** Acting United States Attorney 7 <u>/s/ Skyler H. Pearson</u> SKYLER H. PEARSON /s/ Luther Snavely 8 LUTHER SNAVELY 3365 Pepper Lane, Suite 102 Assistant United States Attorney 9 Las Vegas, Nevada 89120 Attorneys for the United States Attorney for Plaintiff 10 11 IT IS SO ORDERED: 12 13 14 ANDREW P. GORDON UNITED STATES DISTRICT JUDGE 15 DATED: January 11, 2022 16 17 18 19 20 21 22 23 24 25 26 27 28